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Attorneys for Defendant Las Vegas Metropolitan Police Department

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RICHARD BANDA,

Plaintiff,

vs.

NAPHCARE, INC. a corporation; LAS  
VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political entity;  
KRYSTAL CAREY, an individual; ERIC  
LOPEZ, an individual; HORACE TADEO,  
an individual; ANN BOHL, an individual;  
HARRY DURAN, an individual; ANTHONY  
HAYES, an individual; SCOTT COLE, an  
individual; DEBRA VANDERWAAG, an  
individual; SAVANNAH KEAWE, an  
individual; and JOHN/JANE DOES 1-5,

Defendants.

Case Number:

2:19-CV-00095-RFB-DJA

**STIPULATION AND ORDER TO  
EXTEND DEFENDANT LAS VEGAS  
METROPOLITAN POLICE  
DEPARTMENT'S RESPONSIVE  
PLEADING/ANSWER**

**(FIRST REQUEST)**

Plaintiff Richard Banda ("Plaintiff"), by and through their attorneys of record, Adam Hosmer-Henner, Esq., Jane Susskind, Esq., and Kiley Harrison, Esq., with the law firm of McDonald Carano LLP and Defendant, the Las Vegas Metropolitan Police Department (the "Department" or "LVMPD"), by and through their attorneys of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., with the law firm of Marquis Aurbach, and hereby agree and jointly stipulate the following;

1. Plaintiff filed their Second Amended Complaint on September 1, 2023 [ECF No. 68];

2. Plaintiff served their Second Amended Complaint on LVMPD on September 11, 2023 [ECF No. 71];

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1           3. Counsel for LVMPD had a death in the family and has not had sufficient time  
2 to review the Second Amended Complaint and prepare a response, and therefore, is unable to  
3 meet the deadline of October 2, 2023 currently scheduled for LVMPD's response to the  
4 Second Amended Complaint;

5           4. The Parties have agreed to a four-day extension for LVMPD's Responsive  
6 Pleading/Answer to Plaintiff's Second Amended Complaint;

7           5. Accordingly, the deadline for LVMPD's Responsive Pleading/Answer to  
8 Plaintiff's Second Amended Complaint, currently due on October 2, 2023, be extended to and  
9 including Friday, October 6, 2023;

10           6. This is the Parties' first request to extend the deadline to LVMPD's Responsive  
11 Pleading/Answer to Plaintiff's Second Amended Complaint; and

12           7. This Stipulation is being entered in good faith and not for purposes of delay.

13 IT IS SO STIPULATED.

14 DATED this 2nd day of October, 2023

15 McDonald Carano LLP

16 By: /s/ Jane Susskind

17 Adam Hosmer-Henner, Esq.

18 Nevada Bar No. 12779

19 Jane Susskind, Esq.

20 Nevada Bar No. 15099

21 Kiley Harrison, Esq.

22 Nevada Bar No. 16092

23 100 West Liberty Street, Tenth Floor

24 Reno, Nevada 89501

25 Attorneys for Plaintiff Richard Banda

DATED this 2nd day of October, 2023

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By: /s/ Jackie V. Nichols

Craig R. Anderson, Esq.

Nevada Bar No. 6882

Jackie V. Nichols, Esq.

Nevada Bar No. 14246

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Attorneys for Defendant Las Vegas

Metropolitan Police Department

**ORDER**

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED:



UNITED STATES DISTRICT COURT JUDGE

DATED: October 3, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND DEFENDANT LAS VEGAS METROPOLITAN POLICE DEPARTMENT'S RESPONSIVE PLEADING/ANSWER (FIRST REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 2nd day of October, 2023.

☒ I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

☐ I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch

An employee of Marquis Aurbach

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